

The Honorable Franklin D. Burgess

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

CARLOS MARTINEZ JIMENEZ ,

CASE No. C05-5736 FDB

Petitioner,

V.

MARIA GUADALUPE LOZA LOZANO,

Respondent.

**STIPULATION AND ORDER RE: CASE
SCHEDULE AND CONTINUANCE OF
HEARING DATE**

Petitioner Carlos Martinez Jimenez and Respondent Maria Guadalupe Loza Lozano,
through counsel, hereby stipulates as follows:

- (1) Petitioner's and Respondent's trial brief to the Court is due on August 24, 2006;
 - (2) The July 6, 2006 hearing on Petitioner's Amended Petition for Return of Child (the "Petition for Return") (dkt. #5) is hereby continued to August 31, 2006 at 9:00 AM;
 - (3) Mrs. Maria Guadalupe Loza Lozano shall appear, together with RLJ, at the hearing on the Petition on August 31, 2006 at 9:00 AM;
 - (4) Mrs. Maria Guadalupe Loza Lozano is prohibited from removing RLJ from the jurisdiction of this Court pending hearing on the Petition for Return;
 - (5) The previous Case Schedule for the above referenced matter is hereby stricken and no longer applicable.

STIPULATION AND [PROPOSED] ORDER RE
CASE SCHEDULE AND CONTINUANCE OF
HEARING DATE - 1
CASE NO. C05-5736 FDB

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The purpose of this stipulation is to facilitate preparation for the hearing on the Petition for Return. This stipulation allows petitioner time to continue to attempt to secure a visa for the hearing while also allowing respondent time to respond to the Petition for Return.

STIPULATED TO this 23rd day of June, 2006

DLA PIPER RUDNICK GRAY CARY US LLP

s/ Christopher Huck
*Christopher Huck, WSBA No. 34104
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JAMES H. BOLDT

s/ James H. Boldt (E-Mail Authorization on 6/22/06)
James H. Boldt, WSBA No. 32225

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IT IS SO ORDERED.

DATED this 28th day of June 2006.

~~FRANKLIN D. BURGESS~~
UNITED STATES DISTRICT JUDGE

STIPULATION AND [PROPOSED] ORDER RE
CASE SCHEDULE AND CONTINUANCE OF
HEARING DATE - 2
CASE NO. C05-5736 FDB

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CERTIFICATE OF SERVICE

I, Christopher Huck, certify that on the 23rd day of June, 2006, I caused to be served copies of:

- (1) Stipulation and [PROPOSED] Order re: Case Schedule and Continuance of Hearing Date; and

(2) this Certificate of Service
to the following:

James H. Boldt, WSBA No. 32225
P.O. Box 1605
Shelton, WA 98584
Telephone: (360) 427-1432
Facsimile: (360) 426-5832
E-Mail: familylawattorney1@yahoo.com
Attorneys for Respondent

- Via Hand Delivery
- Via U.S. Mail
- Via Facsimile
- Via ECF

I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Executed at Seattle, Washington this 23rd day of June, 2006.

s/Christopher Huck

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STIPULATION AND [PROPOSED] ORDER RE
CASE SCHEDULE AND CONTINUANCE OF
HEARING DATE - 3
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